

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Metro East Industries, Inc.  
Attn: Gayle L. Ortyl  
4600 Kimberly Lake Lane  
Belleville, Illinois 62226

Application No.: 03090011

I.D. No.: 163005AAE

Applicant's Designation:

Date Received: September 4, 2003

Subject: Rail Car Grit Blasting and Painting

Date Issued: May 30, 2006

Expiration Date: May 30, 2011

Location: 3200 Missouri Avenue, Alorton

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting a rail car spray painting operation and a solvent recovery still pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., less than 100 tons/year of volatile organic material (VOM), 25 tons/year of all hazardous air pollutants (HAP), and 10 tons/year of any single HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Pursuant to 35 Ill. Adm. Code 212.123:
  - a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.
  - b. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 1,000 ft radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

3. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- 4a. Pursuant to 35 Ill. Adm. Code 219.204(k), no owner or operator of a heavy off-highway vehicle products coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material, delivered to the coating applicator:

	<u>(Lb/Gal)</u>
i. Extreme Performance Prime Coat	3.5
ii. Extreme Performance Topcoat (Air Dried)	3.5
iii. Final Repair Coat (Air Dried)	3.5
iv. All other coatings are subject to the emission limitations for miscellaneous metal parts and products coatings in 35 Ill. Adm. Code 219.204(j) below:	
A. Clear Coating	4.3
B. Air Dried Coating	3.5
C. Extreme Performance Coating	3.5

- b. Pursuant to 35 Ill. Adm. Code 219.205(d), no owner or operator of a heavy off-highway vehicle products coating line subject to the limitations of 35 Ill. Adm. Code 219.204(k) shall apply coatings to heavy off-highway vehicle products on the subject coating line unless the requirements of subsection 35 Ill. Adm. Code 219.205(d) (1) or 35 Ill. Adm. Code 219.205(d) (2) are met.

- i. Pursuant to 35 Ill. Adm. Code 219.205(d) (1):

For each coating line which applies multiple coatings, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 219.204(k), during the same day (e.g., all coatings used on the line are subject to 3.5 lbs/gal, the daily-weighted average VOM content shall not exceed the coating VOM content limit corresponding to the category of coating used, or

- ii. Pursuant to 35 Ill. Adm. Code 219.205(d) (2):

For each coating line which applies coatings subject to more than one numerical emission limitation in 35 Ill. Adm. Code

219.204(k), during the same day, the owner or operator shall have a site specific proposal approved by the Illinois EPA and approved by the USEPA as a SIP revision. To receive approval the requirements of USEPA's Emissions Trading Policy Statement (and related policy) 51 Fed. Reg. 43814 (December 4, 1986) must be satisfied.

- 5a. The VOM emissions from coating line shall not exceed 12.70 tons/month and 89.0 tons/year. The VOM emissions shall be calculated using the following equation:

$$E = [\sum P_i \times C_i] / 2,000$$

Where:

E - VOM emissions (tons)

P<sub>i</sub> - Coating and solvent usage (gal)

C<sub>i</sub> - VOM content of coating and solvent used (lb/gal)

- b. These limits are based on the maximum production rate. Compliance with annual limits shall be determined from a running total of 12 months of data.
6. This permit is issued based on negligible emissions of volatile organic material (VOM) and particulate matter (PM) from the solvent recovery still. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
7. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
8. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- 9a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105 to establish records required under 35 Ill. Adm. Code 219.211(d), pursuant to 35 Ill. Adm. Code 219.211(a).

- b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the coating line shall be determined as follows:
  - i. The VOM content of representative coatings "as applied" on the coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 Ill. Adm. Code 219.105(a).
  - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition No. 9a directly reflect the application of such material and separately account for any addition of solvent.
- 10a. Pursuant to 35 Ill. Adm. Code 219.211(d)(2) the Permittee shall collect and record all of the following information each day for the coating lines:
  - i. The name and identification number of each coating as applied on each coating line;
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the coating lines; and
  - iii. The daily-weighted average VOM content of all coatings as applied on the affected coating line. The daily-weighted average shall be determined by the following equation, as defined in 35 Ill. Adm. Code 211.1670:

$$VOM_W = \left[ \sum_{i=1}^n V_i C_i \right] / V_T$$

Where:

- $VOM_W$  = The average VOM content of two or more coatings as applied each day on the coating line in units of lb VOM/gallon of coating (minus water and any compounds which are specifically exempted from the definition of VOM);
- $n$  = The number of different coatings as applied each day on a coating line;
- $V_i$  = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on coating line in units of gallons;

$C_i$  = The VOM content of each coating as applied each day on a coating line in units of lb VOM/gallon of coating; and

$V_T$  = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line units of gallons.

- b. In addition, the Permittee shall maintain monthly records of the following items:
- i. Clean-up solvent usage (gallons/month and gallons/year);
  - ii. Density of each clean-up solvent applied (lbs/gallon);
  - iii. VOM and HAP content of each clean-up solvent applied (lbs/gallon);
  - iv. Coating usage of each coating applied (gallons/month and gallons/year);
  - v. Density of each coating applied (lbs/gallon);
  - vi. VOM and HAP content of each coating applied (lbs/gallon); and
  - vii. Total VOM and HAP emissions from the coating lines (tons/month and tons/year) calculated based on the recordkeeping requirements and compliance procedures.
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 11a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- b. Pursuant to 35 Ill. Adm. Code 219.211(d)(3), the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 219.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation, pursuant to 35 Ill. Adm. Code 218.211(d) (3) (A) .
  - ii. At least 30 calendar days before changing method of compliance with 35 Ill. Adm. Code 219 Subpart F from 35 Ill. Adm. Code 219.205 to 35 Ill. Adm. Code 219.204 or 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(c) (1) or (e) (1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 219 Subpart F from 35 Ill. Adm. Code 219.205 to 35 Ill. Adm. Code 219.204 or 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(c) or (e), respectively, pursuant to 35 Ill. Adm. Code 219.211(d) (3) (B) .
12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

It should be noted that the grit blasting operation is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa) .

If you have any questions on this, please call Mike Dragovich at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:MJD:psj

cc: Illinois EPA, FOS Region 3  
Lotus Notes

## Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the railroad car coating systems operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario, which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons per year of VOM, 25 tons per year of all HAPs combined, and 10 tons per year of any single HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less paints and solvents are used, and control measures are more effective than required in this permit.

<u>Equipment/Material</u>	<u>PM (Tons/Yr)</u>	<u>VOM (Tons/Yr)</u>	<u>Single HAP (Tons/Yr)</u>	<u>Combined HAPs (Tons/Yr)</u>
Coating Operation	0.44	89.0		
Solvent Recovery Still		0.44		
Totals:	0.44	89.44	< 10	< 25

MJD:psj